

THE HONORABLE ROBERT J. BRYAN
Trial Date: January 12, 2015

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JOHN L. McCROSSIN and CONNIE M.
McCROSSIN, husband and wife,

Plaintiffs,

v.

A.W. CHESTERTON COMPANY, et al.,

Defendants.

NO. 3:14-cv-05382-RJB

DEFENDANT CBS CORPORATION'S
FED. R. CIV. P. 26(a)(1) INITIAL
DISCLOSURE

Defendant CBS Corporation, a Delaware corporation, f/k/a Viacom Inc., successor by merger with CBS Corporation, a Pennsylvania corporation, f/k/a Westinghouse Electric Corporation ("Westinghouse"), makes the following initial disclosures in accordance with Federal Rule of Civil Procedure 26(a)(1).

PRELIMINARY STATEMENT

Federal Rule of Civil Procedure 26(a)(1) requires the disclosure of the existence of documents and identification of individuals that the disclosing party "may use to support its claims and defenses, unless solely for impeachment."

In accordance with the above requirements, and without waiver of the attorney-client privilege or any other applicable privilege or doctrine, Westinghouse makes the following Rule 26(a)(1) initial disclosures based upon the knowledge and information now reasonably available to it. Westinghouse's investigation and discovery in this case are continuing.

Accordingly, Westinghouse reserves the right to clarify, amend or supplement the information contained in these initial disclosures in accordance with the Federal Rules of Civil Procedure and the Local Rules of this Court. These initial disclosures are provided without prejudice to Westinghouse's right to introduce at a hearing or at trial any evidence that is subsequently discovered.

To the extent Plaintiffs seek production of any confidential or proprietary business information or materials identified herein, such information will be produced only upon the entry of a mutually agreeable protective order. Westinghouse objects to the disclosure requirements to the extent they call for the production of information protected by privilege, and all requirements will be read to exclude production of information so protected. Westinghouse makes these initial disclosures without waiving any of its objections under the Federal Rules of Evidence or the Federal Rules of Civil Procedure including objections as to relevance or admissibility.

I. Individuals Likely to Have Discoverable Information

Westinghouse is presently aware of the following individuals likely to have knowledge of discoverable information that it may use to support its defenses or who have otherwise provided testimony relevant to this litigation:

NAME	ADDRESS	SUBJECT MATTER
J. David Conrad	1706 Demetree Drive Winter Park, Florida 32789	Mr. Conrad has knowledge of relevant facts and personal knowledge of certain work sites throughout the country, but is also an expert based on his specialized knowledge, skill and training.
Roy Belanger	4013 Case Grande Way San Jose, CA 98118	This individual has personal knowledge of relevant facts as a former employee of Westinghouse and its affiliates or expertise based on specialized knowledge, skill and training. His knowledge may further be based on a review of pertinent documents currently available which relate to the equipment at issue, as well as a review of pertinent corporate depositions of former

NAME	ADDRESS	SUBJECT MATTER
		employees of Westinghouse who may have had personal knowledge of relevant issues herein.
Joseph A. Falcon, P.E.	Consulting Power Engineers 17155 Roundhill Drive Huntington Beach, California 92649-4216	Mr. Falcon is a mechanical engineer with over forty years experience in the power and energy fields. Mr. Falcon has personal knowledge of relevant facts but is also an expert based upon his specialized knowledge, skill, and training.
John Goumas	910 Truepenny Road Media, Pennsylvania 19063	Mr. Goumas has personal knowledge of relevant facts, but is also an expert based upon his specialized knowledge, skill, and training. Mr. Goumas, a retired Westinghouse engineer, may testify, either live or by deposition, about general matters concerning the design, manufacture, sales, and installation of <u>Westinghouse steam turbine generators</u> .
Mark Perriello	11 Stanwix Street Pittsburgh, PA 15222	Mr. Perriello has person knowledge of relevant facts but is also an expert based upon his specialized knowledge, skill, and training. He may testify generally regarding industrial hygiene issues.
Charles Reep	3066 Ladovie N.E. Atlanta, Georgia 30345	Mr. Reep, an engineer, has knowledge of relevant facts and personal knowledge of certain work sites throughout the country, but is also an expert based on his specialized knowledge, skill, and training.
John Spencer	Environmental Profiles, Inc. 813 Frederick Road Baltimore, Maryland 21228	Mr. Spencer may testify, either live or by deposition, about the nature of the size, construction, layout, and working environment in the Plaintiff's work site.
John Tabbutt	Iscosa Industries and Maintenance LTD. P.O. Box 1032 Dammam, Kingdom of Saudi Arabia 31431	Mr. Tabbutt has knowledge of relevant facts and personal knowledge of certain work sites throughout the country but is also an expert based on his specialized knowledge, skill, and training.
Wayne Bickerstaff	1241 Sumac Street Westmoreland City, Pennsylvania 15692	Mr. Bickerstaff has personal knowledge of relevant facts but is also an expert based upon his specialized knowledge,

NAME	ADDRESS	SUBJECT MATTER
		skill, and training.
Harry Comerford	Marine Division 401 East Hendy Avenue Post Office Box 3499 (EW-1) Sunnyvale, California 94088	Mr. Comerford has personal knowledge of relevant facts but is also an expert based upon his specialized knowledge, skill, and training.
James E. Duncan	401 E. Hendy Avenue Sunnyvale, California 94088	James Duncan is a marine engineer who worked for private ship lines and, beginning in 1965, for Westinghouse as a marine service engineer.
James M. Gate	401 East Hendy Avenue Sunnyvale, CA 94088-3499	Mr. Gate has personal knowledge of relevant facts but is also an expert based upon his specialized knowledge, skill, and training.
Jim Sanderlin	JTS Associates 300 Helen Street Hampton, SC 29224	Mr. Sanderlin was employed in sales with the Westinghouse Micarta Division in Hampton, South Carolina.
Tom Shaw	LMC Plastisource P.O. Box 6710 Philadelphia, Pennsylvania 19132	Mr. Shaw has personal knowledge of relevant facts but is also an expert based upon his specialized knowledge, skill, and training.
Dennis Weisenburger	University of Nebraska Medical Center Department of Pathology and Microbiology 600 South 42nd Street Omaha, NE 68198-3135	Dr. Weisenburger is the Director of Hematopathology and serves as a consulting pathologist for the International Consortium of Investigators working on Lymphoma Epidemiologic Studies (interLymph).
Stephen M. Ayres, M.D.	Chairman, Department of Internal Medicine St. Louis University School of Medicine 1325 Grand Avenue St. Louis, Missouri 63104	Dr. Ayres is a medical expert in internal medicine with knowledge of state-of-the-medical-art; knowledge of clinical aspects of pulmonary diseases; effects of smoking; studies of and medical literature regarding lung diseases, including cancer, mesothelioma, and asbestosis.
Oscar Auerbach, M.D. (By videotape deposition or by live testimony)	East Orange Veteran's Administration Hospital S.M.I. Laboratory (151B) East Orange, NJ 07019	Dr. Auerbach is a pathologist with knowledge of the pathology of pulmonary diseases, including, but not limited to, asbestosis, mesothelioma, lung cancer, chronic bronchitis and emphysema.
Hector Battifora,	Division of Pathology	Dr. Battifora is an anatomic pathology

NAME	ADDRESS	SUBJECT MATTER
M.D.	City of Hope National Medical Center 1500 East Duarte Road Duarte, CA 91010	expert with knowledge of the pathology of pulmonary disease, including asbestosis, mesothelioma and lung cancer, as well as knowledge of electron microscopy techniques and immunohistochemical techniques.
Roger Beckett (By live testimony or by deposition)	Industrial Hygienist Naval Regional Medical Center, Code 430 Bremerton, WA 98314	Mr. Beckett is an industrial hygienist at Puget Sound Naval Shipyard (PSNS) who has knowledge of The U.S. Government's awareness of potential health hazards associated with the use of asbestos-containing products at government shipyards; workplace conditions at PSNS; health studies conducted at PSNS relative to asbestos exposure; and the PSNS program to control asbestos exposure.
Daniel Bessmer	Retired Industrial Hygienist 6700 Stampede Blvd NW Seattle, WA 98310	Mr. Bessmer is a retired industrial hygienist and former head of the Industrial Hygiene Department at Puget Sound Naval Shipyard (PSNS) and former industrial hygienist at several other naval shipyards.
Robert Burdick, M.D.	The Polyclinic 1200 Harvard Avenue Seattle, Washington 98122	Dr. Burdick is a medical oncologist who may testify to the cause, nature, diagnosis, prognosis and treatment of malignant diseases.
Phillip Cagle, M.D. Associate Professor	Baylor College of Medicine Department of Pathology One Baylor Plaza, Rm. 286A Houston, Texas	Dr. Cagle is a specialist in pathology with knowledge of the diagnosis, causation, and clinical aspects of pulmonary diseases, the history and development of the medical state-of-the-art, the pathology of cancer and disease processes, the effects of smoking, and the medical literature regarding smoking and regarding pulmonary diseases and cancer.
Darryl Carter, M.D.	c/o Yale University School of Medicine Department of Pathology P.O. Box 208070 New Haven, CT 06520-8070	Dr. Carter is a board-certified pathologist with knowledge of the pathology of pulmonary diseases, including, but not limited to, asbestosis, mesothelioma, lung cancer, chronic bronchitis, and emphysema.

NAME	ADDRESS	SUBJECT MATTER
Jeffrey M. Cary, M.D.	801 Broadway, #814 Seattle, Washington 98122	Dr. Cary is a medical expert as to pulmonary and other diseases and has a "B" reader designation.
Kenneth Casey, M.D.	The Mason Clinic, 8 North 1100 Ninth Avenue Seattle, WA 98101	Dr. Casey is a pulmonologist and a "B" reader. He is an expert in pulmonary diseases and the X-ray findings associated with pneumoconioses.
Andrew Churg, M.D., Ph.D. (By live testimony or by deposition)	Department of Pathology Health Sciences Centre Hospital University of British Columbia 2211 Westbrook Mail Vancouver, B.C. CANADA V6T 1W5	Dr. Churg is a pathologist with knowledge of the pathology of pulmonary diseases, including asbestosis, mesothelioma, lung cancer, chronic bronchitis and emphysema.
Joseph Cimino, M.D.	Department of Community and Preventive Medicine at New York Medical College Valhalla, New York	Dr. Cimino, professor and chairman of the Department of Community and Preventive Medicine at New York Medical College, has knowledge of state-of-the-medical-art; clinical aspects of pulmonary diseases; effects of smoking; studies of and medical literature regarding lung diseases, including cancer, mesothelioma, and asbestosis.
Thomas Colby, M.D.	Mayo Clinic Department of Pathology 200 1st Street SW Rochester, MN 55905	Dr. Colby is a pathologist with knowledge of the pathology of pulmonary diseases, including, but not limited to, asbestosis, mesothelioma, lung cancer, chronic bronchitis and emphysema.
W. Clark Cooper, M.D. (By live testimony or by deposition)	2150 Shattuck Avenue Berkeley, California	Dr. Cooper has knowledge of internal medicine, occupational disease, industrial hygiene, state-of-the-medical-art involving asbestos-related diseases, and the clinical and epidemiological aspects of pulmonary diseases and asbestos-related diseases.
John E. Craighead, M.D. (By live testimony or by deposition)	1845 Four Winds Road Ferrisburg, Vermont 05456 Phone: (802) 425-3480	Dr. Craighead is a pathologist with knowledge of asbestos-related diseases, pulmonary diseases, cancer and the relationship between asbestos fibers and asbestos-related disease.

NAME	ADDRESS	SUBJECT MATTER
J.N.P. Davies, M.D.	5 Pine Street Albany, New York	Dr. Davies has knowledge of state-of-the-medical-art; clinical aspects of pulmonary diseases; effects of smoking; studies of and medical literature regarding lung diseases, including cancer, mesothelioma and asbestosis.
Harry P. Demopoulos, M.D.	Associate Professor of Pathology New York University Medical Center 550 First Avenue New York, New York 10016	Dr. Demopoulos has knowledge of and may testify regarding the following: the state-of-the-medical-art; clinical aspects of pulmonary diseases; and the clinical aspects, diagnosis, causation, studies of, and medical literature regarding lung diseases, particularly cancer, as may be associated with asbestos, smoking and otherwise, both generally and in the context of plaintiff's/decedent's medical condition.
David F. Dreis, M.D.	Virginia Mason 1100 Ninth, C8N P.O. Box 900 Seattle, WA 98111	Dr. Dreis is a medical expert as to pulmonary and other diseases.
Edward A. Gaensler, M.D. (by live testimony)	Professor, Surgery and Physiology Thoracic Surgery Boston University Medical Center 80 East Concord Street Boston, MA 02118	Dr. Gaensler is a medical specialist in pulmonary diseases and thoracic surgery with special knowledge of asbestos-related diseases.
David Godwin, M.D.	Department of Radiology, SB-05 University of Washington Hospital Seattle, Washington 98195	Dr. Godwin is a board certified radiologist and a certified B-reader.
Dennis Hansen, M.D.	Virginia Mason South 33501 First Avenue South Federal Way, WA 98003	Dr. Hansen is a board certified cardiologist and an expert in diseases of the heart, who may testify to the cause, nature, diagnosis, prognosis and treatment of cardiovascular disease in general and/or regarding plaintiff/decedent.
Raymond D. Harbison, Ph.D.	Progress Center, Room N103 One Progress Blvd., Box 13 Alachua, Florida 32615	Dr. Harbison is a pharmacologist-toxicologist who will testify regarding the history, methods, and subject area of pharmacology and toxicology as it relates

NAME	ADDRESS	SUBJECT MATTER
		to all substances, including asbestos.
Elliott Hinkes, M.D.	301 North Prairie Avenue, Suite 311 Inglewood, CA 90301	Dr. Hinkes is a licensed physician specializing in oncology.
H. Corwin Hinshaw, M.D. (By live testimony or by deposition)	450 Sutter Street San Francisco, California	Dr. Hinshaw is a specialist in internal medicine with knowledge of state-of-the- medical art; knowledge of clinical aspects of pulmonary diseases; and knowledge of clinical aspects, diagnosis and causation of lung and gastrointestinal cancer.
Robin Johnston, M.D.	Virginia Mason 1100 Ninth Avenue Seattle, Washington 98101	Dr. Johnston is a cardiologist and an expert in diseases of the heart, who may testify to the cause, nature, diagnosis, prognosis and treatment of cardiovascular disease in general and/or regarding plaintiff/decedent.
Reynold M. Karr, M.D.	3128 Norton Avenue Everett, Washington 98201	Dr. Karr is a board certified internist and rheumatologist with specific knowledge of rheumatologic diseases.
David Knowles, Ph.D.	P.O. Box 71 Edmonds, WA 98020	Dr. Knowles is an economist with knowledge of and expert opinions pertaining to economic issues raised by plaintiff, including the existence or nonexistence of economic losses and the extent thereof.
Robert F. Lane, M.D.	Northwest Cancer Center 1560 NW 115th Seattle, WA 98133	Dr. Lane is a licensed physician specializing in oncology.
Arthur M. Langer, Ph.D.	Mt. Sinai School of Medicine Associate Professor of Mineralogy New York, New York	Dr. Langer will testify regarding the effects of chrysotile asbestos fibers with respect to the causation and/or development of mesothelioma and other cancerous conditions as well as other health conditions and/or medical history pertinent to plaintiff's/decedent's case.
James E. Lockey, M.D., M.S. (By live testimony or by deposition)	3848 Chimney Hill Drive Cincinnati, Ohio 45241	Dr. Lockey is a medical expert in Internal Medicine, Occupational Medicine and Pulmonary Medicine.

NAME	ADDRESS	SUBJECT MATTER
Carl Mangold	By deposition	Mr. Mangold is an industrial hygienist and was formerly employed at PSNS as an industrial hygienist.
James F. Morgan	612 Marion Avenue Havertown, PA19083	Mr. Morgan may provide expert and factual testimony that the government was aware of the health hazards of asbestos prior to 1942, and testimony regarding government contract shipyards.
William K.C. Morgan, M.D. (By live testimony or by deposition)	Director, Chest Diseases Unit, University Hospital University of Western Ontario P.O. Box 5339, Postal Station A London, Ontario N6A SAS	Dr. Morgan has knowledge of the pathology, diagnosis, testing and causation of pulmonary diseases and may testify with respect to the development of scientific knowledge pertaining to asbestos-related diseases.
Kenneth Nelson	1894 Mill Creek Way Salt Lake City, Utah	Kenneth Nelson will testify about his work and the studies in which he participated relating to asbestos beginning as far back as the 1940's, including his work in industrial hygiene related to U.S. government shipyards and private shipyards.
A. Mitchell Polinsky	Stanford University Josephine Scott Crocker Professor of Law and Economics, Crown Quadrangle Stanford, CA 94306-8610	Dr. Polinsky is an economist with knowledge of and expert opinions pertaining to economic issues, economic losses and the extent thereof.
Lee B. Reichman, M.D., M.P.H.	College Hospital 100 Bergen Street Newark, NJ 07103	Dr. Reichman is a pathologist with knowledge regarding occupational diseases of the lung and the history of medical knowledge pertaining to major types of asbestos-related disease.

NAME	ADDRESS	SUBJECT MATTER
William Salyer, M.D.	Alta Bates Hospital 3001 Colby Plaza at Ashby Berkeley, California 94705	Dr. Salyer is a licensed physician and pathologist and the Director of Anatomic Pathology at Alta Bates Hospital and may testify as to various principles of pathology and their relationship to plaintiff's/decedent's medical condition and concerning issues of his specialty as applicable to the medical issues presented by this case.
Robert Schoene, M.D.	Harborview Medical Center 325 Fifth Avenue Seattle, Washington 98104	Dr. Schoene is a medical expert as to pulmonary and other diseases.
Khalil Sheibani, M.D.	Division of Pathology City of Hope National Medical Center 1500 East Duarte Road Duarte, California 91010	Dr. Sheibani is an anatomic pathology expert with knowledge of the pathology of pulmonary disease, including asbestosis, mesothelioma and lung cancer, as well as knowledge of electron microscopy techniques and immunohistochemical techniques.
Dorsett D. Smith, M.D. (By live testimony or by deposition)	4310 Colby, Suite 201 Everett, Washington 98201	Dr. Smith is a pulmonary specialist and radiologist with "B" reader designation.
David Tinker, M.D.	Cardiovascular Diseases 1225 Campbell Way Bremerton, WA98310	Dr. Tinker is a cardiologist and an expert in diseases of the heart who may testify as to the cause, nature, diagnosis, prognosis and treatment of cardiovascular disease in general, and/or regarding plaintiff/decedent.
Frederic Tobis, M.D.	2560 N. 115th St., Suite 2-1 Seattle, Washington 98133	Dr. Tobis is a cardiologist with knowledge of cardiology and the interrelationship of the pulmonary and cardiovascular systems who may testify as to the plaintiff's/decedent's cardiovascular functions, medical history, and the diagnoses and prognoses relevant to plaintiff's/decedent's medical condition.
Hans Weill, M.D. (By live	Occupational and Environmental Lung Disease	Dr. Weill is a pulmonary specialist with knowledge of the clinical aspects of

NAME	ADDRESS	SUBJECT MATTER
testimony or by deposition)	Center Tulane University School of Medicine 1700 Perdido Street New Orleans, LA 70122	pulmonary diseases and the development of scientific knowledge concerning asbestos-related diseases who may testify regarding this knowledge and the medical condition, medical history and any diagnoses and prognoses relevant to plaintiff's/decedent's medical condition.
Noel S. Weiss, Ph.D., M.D.	Chairman, Department of Epidemiology University of Washington, SC-36 Health Sciences Building, F263-D 1959 Pacific Avenue NE Seattle, WA 98195	Dr. Weiss is an expert in epidemiology, the statistical study of diseases in a population.
Louis Zibelli, M.D.	Group Health Eastside Redmond, WA 98052	Dr. Zibelli is a cardiologist with knowledge of the pulmonary and cardiovascular systems who may testify as to the plaintiff's/decedent's cardiovascular functions, medical history and the diagnoses and prognoses relevant to plaintiff's/decedent's medical condition.
Douglas Fowler, Ph.D.	Fowler Associates 643 Bair Island Rd, Suite 305 Redwood City, CA 94604	Dr. Douglas P. Fowler is an industrial hygiene consultant.
Jack E. Petersen, Ph.D., C.I.H., P.E.	2830 Via Viejas Oeste Alpine, California 91901	Mr. Peterson is a certified industrial hygienist.
William Hughson, M.D.	UCSD Center for Occupational & Environmental Medicine Administrative Offices 200 West Arbor Drive San Diego, CA 92103-8800	Dr. Hughson is a licensed physician and an epidemiologist.
Edward B. Ilgren, M.D.	830 Montgomery Avenue, No. 503 Bryn Mawr, PA 19010	Dr. Ilgren is a licensed physician and pathologist. He will testify regarding the etiology and epidemiology of mesothelioma and other asbestos-related

NAME	ADDRESS	SUBJECT MATTER
		diseases.
James D. Crapo, M.D.	Professor of Medicine and Pathology Chief of Division of Critical Case and Pulmonary Medicine Board Certified Internal Medicine and Pulmonary Medicine National Jewish Medical and Research Center 1400 Jackson Street Denver, CA 80206	Dr. Crapo is a licensed physician and pulmonary specialist who will testify regarding the epidemiology of asbestos exposure and the diseases caused by such exposure, and concerning issues of his specialty as applicable to the medical issues presented by this case.
John Lloyd McCrossin, Jr.	c/o Glenn S. Draper Bergman Draper Ladenburg, PLLC., 614 First Avenue, Third Floor, Seattle, WA 98104	Plaintiff/PID
Connie Marie McCrossin	c/o Glenn S. Draper Bergman Draper Ladenburg, PLLC., 614 First Avenue, Third Floor, Seattle, WA 98104	Plaintiff/Spouse of John L. McCrossin
Kyle Robert McCrossin	2610 South 376 th Place Federal Way, WA 98003	Son of John L. McCrossin
Kevin John McCrossin	2610 South 376 th Place Federal Way, WA 98003	Son of John L. McCrossin
Claudia Josephine McCrossin	10027 98 th Street SW Tacoma, WA 98498	Mother of John L. McCrossin
Guy Taye McCrossin	389 E. Madison, Elmhurst, IL 60126	Sibling of John L. McCrossin
Brenda Lee Brewer	Sumner, WA 98390	Sibling of John L. McCrossin
Michael Shawn McCrossin	Wiley, TX 75098	Sibling of John L. McCrossin
Michal (Misho) Hubka, M.D.	Virginia Mason Hospital & Seattle Medical Center 1100 Ninth Avenue Seattle, WA 98101	Treating physician
Guobin Song, M.D.	Virginia Mason Hospital & Seattle Medical Center 1100 Ninth Avenue Seattle, WA 98101	Treating physician

NAME	ADDRESS	SUBJECT MATTER
Gurkamal S. Chatta, M.D.	Virginia Mason Hospital & Seattle Medical Center 1100 Ninth Avenue Seattle, WA 98101	Treating physician
Kathleen Horan, M.D.	Virginia Mason Hospital & Seattle Medical Center 1100 Ninth Avenue Seattle, WA 98101	Treating physician
Linda Johnson, M.D.	Virginia Mason Federal Way Medical Center 33501 First Way South Federal Way, WA 98003	Treating physician
Dr. Bernardo H. L. Goulart, M.D., M.S.	Seattle Cancer Care Alliance Fred Hutchinson Cancer Center 825 Eastlake Avenue East Seattle, WA 98109	Treating Physician
Douglas Earl Wood, M.D.	Thoracic Surgery Clinic University of Washington Medical Center 1959 NE Pacific Street Seattle, WA 98195	Treating Physician
Records Custodian	Fife Education Association 201 43 rd Avenue SE Puyallup, WA 98374	Union Records
Records Custodian	Tacoma Education Association IBEW Building 3049 South 36 th Street, Suite 300 Tacoma, WA 98409	Union Records
Records Custodian	Sumner Education Association 1202 Wood Avenue Sumner, WA 98390	Union Records
Records Custodian	Association of Washington School Principals 1021 8 th Avenue SE Olympia, WA 98501	Union Records
Records Custodian	National Education Association 32032 Weyerhaeuser Way South Federal Way, WA 98001	Union Records

NAME	ADDRESS	SUBJECT MATTER
George Haag	By deposition	PID
Walter L. Allen	By deposition	PID
Charles Bonnett	By deposition	PID
Gilbert Rey Cox	By deposition	PID
Ronald Eastman Cox	By deposition	PID
Albert Fox	By deposition	PID
Dean Hammers	By deposition	PID
Richard James Harvey	By deposition	PID
John Jagger	By deposition	PID
Basil Kempf	By deposition	PID
Alfred E. Lede	By deposition	PID
Robert R. Leonard	By deposition	PID
Francis Mox	By deposition	PID
Hugh F. Tefft	By deposition	PID
William Thomas	By deposition	PID
Bert Workman	By deposition	PID

Westinghouse also identifies: (1) all individuals whose names appear in the documents previously produced in this action, or to be produced in the future, by any party in this litigation; and (2) all individuals identified in depositions of employees or former employees of any defendant, or any co-worker witnesses that may have worked with or around Plaintiff Mr. McCrossin during his lifetime and would potentially have knowledge concerning the subject matter of this action. All such individuals are identified herein by this reference. Westinghouse also specifically reserves the right to call any witness who is identified from any of the documents produced in this litigation by any party, or third-party, and further reserves the right to call any witnesses identified by any other party.

In addition, Westinghouse identifies the following categories of persons or entities who are likely to have discoverable information that Westinghouse may use to support its defenses:

- Plaintiff John L. McCrossin's treating physicians, nurses, therapists and other medical providers;
- Plaintiff John L. McCrossin's current and former employers;

- 1 • Individuals with knowledge of the events at issue;
- 2 • Individuals with knowledge of the damages allegedly suffered by Plaintiff John L.
- 3 McCrossin; and
- 4 • Individuals with knowledge of the pain and suffering allegedly suffered by Plaintiff
- 5 John L. McCrossin.

6 By listing the above persons and entities, Westinghouse makes no representation as to
 7 the personal knowledge of the individuals, or that the list includes all individuals who may
 8 have discoverable information as contemplated by Rule 26(a)(1)(A).

9 **II. Documents that may be Used to Support Defenses**

10 Westinghouse hereby identifies and incorporates by reference the attached **Exhibit A** as
 11 documents in its possession, custody, or control that it may use to supports its defenses.
 12 Westinghouse reserves the right to supplement this list.

13 **III. Computation of Damages Claimed By Defendants**

14 Westinghouse is not alleging damages at this time. This response, however, does not
 15 waive any right or interest Westinghouse may have in asserting a claim for damages, attorneys'
 16 fees, or costs of suit which may be appropriately asserted once the merits of the cross-claims
 17 asserted against it are adjudicated.

18 **IV. Insurance Agreement That May Satisfy Part or All of a Judgment**

19 Westinghouse objects to the disclosure of any information concerning any insurance
 20 agreements in this litigation. The disclosure of such information is not reasonably calculated to
 21 lead to the discovery of information admissible as evidence at trial. In addition, the attorney-client
 22 privilege and work product doctrines may protect such information from disclosure. Subject to
 23 and without waiving these objections, Westinghouse had numerous policies of insurance, both
 24 primary and excess or umbrella policies, covering claims for alleged bodily injury. Coverage
 25 under the various policies may depend on the plaintiffs' alleged dates of direct exposure,

1 exposure in residence, manifestation, or other pertinent dates. Westinghouse is either insured
2 and/or is self-insured and has assets sufficient to respond to a judgment in this action.

3 DATED this 31st day of July, 2014.

4 s/Christopher S. Marks, WSBA #28634
5 Christopher S. Marks, WSBA #28634
6 Attorneys for Defendant Westinghouse
7 Corporation
8 SEDGWICK LLP
9 520 Pike Tower, 520 Pike St, Ste. 2200
10 Seattle, WA 98101
11 Telephone: (206) 462-7560
12 Facsimile: (206) 462-7561
13 Email: chris.marks@sedgwicklaw.com
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of July, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Brian F. Ladenburg
Chandler H. Udo
BERGMAN DRAPER LADENBURG, PLLC
614 First Avenue, Fourth Floor
Seattle, WA 98104
Attorneys for Plaintiffs

J. Michael Mattingly
Jason Daywitt
Allen E. Eraut
RIZZO MATTINGLY BOSWORTH PC
1300 SW Sixth Avenue, Suite 330
Portland, OR 97201-3530
Attorneys for Warren Pumps, LLC

G. William Shaw
K&L GATES
925 Fourth Avenue, Suite 2900
Seattle, WA 98104
Attorneys for Crane Company

Mark Tuvim
Kevin Craig
GORDON & REES, LLP
701 Fifth Avenue, Suite 2130
Seattle, WA 98104
Attorneys for Ingersoll-Rand Company

Howard (Terry) Hall
Jason C. Hawes
WOLFSTONE, PANCHOT & BLOCH
1111 Third Avenue, Suite 1800
Seattle, WA 98101
Attorneys for Lone Star Industries, Inc.

Timothy K. Thorson
CARNEY BADLEY SPELLMAN
701 Fifth Avenue, Suite 3600
Seattle, WA 98104
Attorneys for Saberhagen Holdings, Inc.

Anne D. Foster
DUNN CARNEY ALLEN HIGGINS &
TONGUE LLP
851 SW Sixth Ave., Suite 1500
Portland, OR 97204
Attorneys for A.W. Chesterton Company

Christine Dinsdale
Michael O' Clair
SOHA & LANG, P.S.
1325 Fourth Avenue, Suite 2000
Seattle, WA 98101
Attorneys for BW/IP, Inc.; Goulds Pumps, Inc.

James E. Horne
Michael Ricketts
GORDON, THOMAS, HONEYWELL,
MALANCA, PETERSON & DAHEIM
600 University Street, Suite 2100
Seattle, WA 98101
Attorneys for IMO Industries, Inc.

Robert Andre
OGDEN, MURPHY, WALLACE
901 Fifth Avenue, Suite 3500
Seattle, WA 98164
Attorneys for Lockheed Shipbuilding Company

Richard Gawlowski
WILSON, SMITH, COCHRAN &
DICKERSON
901 Fifth Avenue, Suite 1700
Seattle, WA 98164
Attorneys for Metropolitan Life Insurance Company

Signed at Seattle, Washington this 31st day of July, 2014.

s/Maria S. Tiegen

Maria S. Tiegen
SEDGWICK LLP
520 Pike Street, Suite 2200
Seattle, WA 98101
Telephone: (206) 462-7560
Email: Maria.Tiegen@sedgwicklaw.com